

**AMENDMENTS TO THE DRAWINGS**

The attached sheet of drawing includes changes to Fig. 4. This sheet replaces the original sheets of drawing of Fig. 4. In Fig. 4, under the file heading FILE A2 in the middle, "FILE A2 LOCAL COMPUTER" at the top has been changed to "FILE A LOCAL COMPUTER". In addition, under the file heading FILE A3 on the right, "REDUCED FROM FILE A" has been changed to "REDUCED FROM FILE A2".

### **REMARKS**

Concurrently with filing of the RCE in response to the Office Action dated June 27, 2007, claims 1, 2 and 4-15 have been amended and claim 16 has now been canceled. Claims 1, 2, and 4-15 are now active in this application. No new matter has been added.

Each of dependent claims 5-15 has been amended to begin with “The” instead of “A”. These claim amendments are non-narrowing claim amendments.

### **AMENDMENTS TO THE DRAWINGS**

In Fig. 4, under the file heading FILE A2 in the middle of the figure, “FILE A2 LOCAL COMPUTER” at the top has been changed to “FILE A LOCAL COMPUTER”. In addition, under the file heading FILE A3 on the right of the figure, “REDUCED FROM FILE A” has been changed to “REDUCED FROM FILE A2”.

Support for this correction is provided at page 14, lines 18-21 and page 15, lines 14-20 of the present specification.

### **REJECTION OF CLAIMS UNDER 35 U.S.C. § 112, FIRST PARAGRAPH**

Claim 14 has been rejected under 35 U.S.C. §112, first paragraph, as failing to comply with the written description requirement. The Examiner contends that “the original data and at least two sets of derivative data are managed as a tree structure” is not described in the specification in such a way as to reasonably convey to one skilled in the relevant art that the inventor(s), at the time the application was filed, had possession of the claimed invention.

The rejection is respectfully traversed.

A “tree structure” is supported by Fig. 4 of the present application. In Fig. 4, the illustrated relation between FILE A (original data), FILE A1 (derivative data), FILE A2 (derivative data), and FILE A3 (derivative data) is a tree structure. That is, since a tree structure is understood in the art to mean a way of representing the hierarchical nature of a structure in a graphical form, as evidenced in the attached pages from Wikipedia, Fig. 4 explicitly illustrates a “tree structure” relationship for FILE A1, FILE A2 and FILE A3 with respect to parent node FILE A.

Therefore, the specification has been amended at page 13, lines 9-11 to describe:

Figure 4 shows a file tree structure comprising the original file (the file A) and the derivative files thereof generated from various kinds of processing on the original file.

It is submitted that merely identifying the hierarchical arrangement of files illustrated in Fig. 4 as a “tree structure” is not new matter since what is illustrated in Fig. 4 is, in fact, a tree structure and a person of ordinary skill in the art would immediately recognize that what is illustrated in Fig. 4 is a tree structure.

#### **REJECTION OF CLAIMS UNDER 35 U.S.C. § 112, SECOND PARAGRAPH**

Claims 15 and 16 have been rejected under 35 U.S.C. § 112, second paragraph, as being indefinite. In support of this position, the Examiner maintains that there is insufficient antecedent basis for “other derivative data” and that it is unclear whether another derivative data is generated from the derivative data or from the original data.

The rejection is moot as to canceled claim 16.

By this response, independent claim 1 has been amended to recite:

A data management method for managing original data, first derivative data which is generated through editing processing on the original data, and second derivative data which is generated through editing processing on the first derivative data, by relating the original data, the first derivative data, and the second derivative data, the data management method comprising the steps of:

- generating first link information for linking the original data and the first derivative data and first editing information representing the content of the editing processing on the original data;

- attaching the first link information and the first editing information to the original data and the first derivative data as first accompanying information thereof;

- generating second link information for linking the first derivative data and the second derivative data and second editing information representing the content of the editing processing on the first derivative data; and

- attaching the second link information and the second editing information to the first derivative data and the second derivative data as second accompanying information thereof.

In addition, claim 15, depending from claim 1, has been amended to recite:

The data management method, as defined in Claim 1, further comprising the steps of:

- generating third link information for linking the original data and said second derivative data and third editing information representing the content of the editing processing to generate said second derivative data from the original data, and

- attaching the third link information and the third editing information to the original data and said second derivative data as third accompanying information thereof.

In view of the amendments to claims 1 and 15, there is antecedent support for reciting each of the derivative data and it is clear how the derivative data is generated. More specifically, amended claim 15, considered with amended independent claim 1, recites the invention with the degree of precision and particularity required by the statute. Therefore, it is respectfully urged that the rejection be withdrawn as to amended claim 15.

**REJECTION OF CLAIMS UNDER 35 U.S.C. § 103**

Claims 1, 2 and 4-13 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Meek (USPN 7,092,969).

To expedite prosecution, independent claim 1 has been amended to include, *inter alia*, the limitations of claim 16, now canceled.

Independent claim 4 has been amended to recite similar subject matter.

Support for the amendments to the independent claims is provided, for example, at page 7, lines 6-13, page 13, line 9 through page 16, line 1 (specifically, the description regarding the relationship between file A2 and A3).

(a) In Meek et al., a source image data set is directly related to a plurality of derivative data sets. In contrast, in the present invention, an original data set is hierarchically (multi-generationally) related to a plurality of derivative data sets. Specifically, in the invention recited in amended independent claim 1, the original data is related to the first derivative data and also the first derivative data is related to the second derivative data. This feature is not disclosed in Meek et al. Thus, amended claim 1 is patentable over Meek et al.

(b) In Meek et al., the link information and the editing information are indirectly attached to the source image data via a repository database. On the other hand, in the present invention, the link information and the editing information are directly attached to the original data.

Regarding (b) above, Meek et al. disclose that the link information and the editing information are directly attached to the derivative image data. Based on this disclosure, it may seem possible that the above direct attachment is applied to the source image data. However, in the case that a great number of derivative image data sets are generated from a source image data set (see column 3, lines 12-31 of Meek et al.), this appears to be an impracticable idea because in Meek et al., the source image data set is directly related to all of the derivative data and thus, large amounts of the accompanying information would be attached to the source image data set.

Meanwhile, in the present invention, in the above case, the original data set can be hierarchically (multi-generationally) related to a derivative data set or a derivative data set can be hierarchically (multi-generationally) related to another derivative data set after hierarchically (multi-generationally) generating the derivative data sets according to the contents of editing processing. As a result, the accompanying information is decentrally-attached to either the original data set or the derivative data sets and thus, the above drawback of Meek et al. can be resolved. Further, the present invention does not need an additional metadata management system such as a database or a repository as disclosed in Meek et al.

To further expedite prosecution, independent claim 2 has been amended to recite:

A data management apparatus for managing original data, first derivative data which is generated through editing processing on the original data, and second derivative data which is generated through editing processing on the first derivative data, by relating the original data, the first derivative data, and the second derivative data, the data management apparatus comprising:

first link information generation means for generating first link information for linking the original data and the first derivative data and first editing information representing the content of the editing processing on the original data;

first information attaching means for attaching the first link information and the first editing information to the original data and the first derivative data as first accompanying information;

second link information generation means for linking the first derivative data and the second derivative data and second editing information representing the content of the editing processing on the first derivative data; and

second information attaching means for attaching the second link information and the second editing information to the first derivative data and the second derivative data as second accompanying information thereof.

Claims 5-13 have been amended to more clearly recite the subject matter of the invention and to be consistent with amended independent claim 1.

In view of the above, amended independent claims 1, 2 and 4 are patentable over Meek et al., as are amended dependent claims 5-13. Therefore, the allowance of claim 1, 2 and 4-13, as amended, is respectfully solicited.

## **CONCLUSION**

Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact Edward J. Wise (Reg. No. 34,523) at the telephone number of the undersigned below, to conduct an interview in an effort to expedite prosecution in connection with the present application.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17; particularly, extension of time fees.

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Respectfully submitted,

By 

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Attachments: Copy of pages 1-4 – Tree Structure – Wikipedia  
One Replacement Sheet of drawings